# Exhibit L

# MacInnis 7,530,027 Applied to Representative Panasonic and Toyota Accused Products

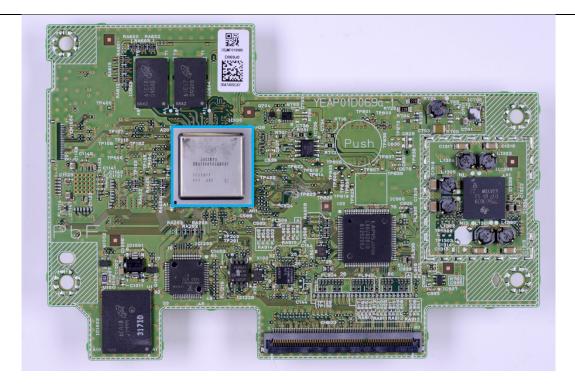
This claim chart compares independent claim 11 of U.S. Patent No. 7,530,027 ("the MacInnis '027 patent") to Texas Instruments' DRA750 system on a chip ("SoC").

On information and belief, Texas Instruments's DRA750 SoC is representative of other Texas Instruments infotainment and high-end car information system SoCs having similar functionality ("Accused Texas Instrument Infotainment SoCs").

The DRA750 SoC is incorporated in downstream products, including without limitation, Panasonic head units, such as Ser. Nos. 130105, 104020, 104069, 500021, which are incorporated in Accused Toyota Navigation units, including Highlander Receiver (86804-0E280), Sienna Navigation Unit (86804-08040), Avalon Navigation Head Unit (86804-07120), and Prius III Navigation System Kit (86804-47330), respectively.

On information and belief the Accused Texas Instrument Infotainment SoCs, and head units and automobiles that incorporate the Accused Texas Instrument Infotainment SoCs infringe directly, indirectly, and or under the doctrine of equivalents, at least claim 11 of the MacInnis '027 patent.

Claim – U.S. Patent	Application of Claim Language to Accused Product											
No. 7,530,027												
(MacInnis)												
Claim 11												
A system for processing graphics images, comprising:	To the extent that the preamble is deemed limiting, the Accused Texas Instrument Infotainment SoCs and head units and automobiles that incorporate the Accused Texas Instrument Infotainment SoCs comprise a system for processing graphics images.  At least the Panasonic Navigation Unit Model No. 86804-47330 incorporates the Texas Instruments DRA750 (highlighted in blue)											

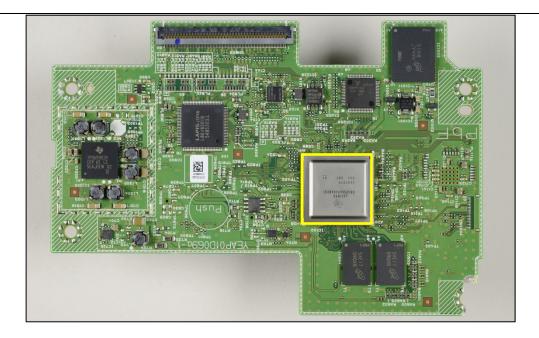


The following photograph of the 2017 Toyota Prius III, which includes Panasonic Navigation Unit Model No. 86804-47330, shows the Texas Instruments DRA750 in the Panasonic Navigation Unit Model No. 86804-47330 processing graphics images.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Image from http://autoweek.com/gallery/car-reviews/gallery-2017-toyota-prius-three-interior



Additionally, the Panasonic Navigation Unit Model No. 86804-08040 incorporates the Texas Instruments DRA750 (highlighted in yellow).



The following photographs of the 2017 Toyota Sienna, which includes Panasonic Navigation Unit Model No. 86804-08040, show the Texas Instruments DRA750 in the Panasonic Navigation Unit Model No. 86804-08040 processing graphics images.





a window controller for obtaining data that describes windows in which the graphics images are displayed, and for sorting the data The Accused Texas Instrument Infotainment SoCs' and head units and automobiles that incorporate the Accused Texas Instrument Infotainment SoCs' system for processing graphics images comprise a window controller for obtaining data that describes windows in which the graphics images are displayed, and for sorting the data in accordance with respective depths of the windows because they include at least a Display Controller (DISPC) and/or a 2D Graphics Engine (BB2D).

in accordance with respective depths of the windows; The Technical Reference Manual for the DRA75x SoC for Automotive Infotainment Silicon Revision 2.0, 1.x explains that, in the Display Controller (DISPC), there is an overlay manager which displays more than one layer (GFX, VID1, VID2, and VID3 layers) using, at least, "[a] priority rule based on a Z-order: Application can set the ordering layer of the frames." Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 2942.

The Technical Reference Manual further explains that the Z-Order parameter sorts data in accordance with the respective depths of windows.

# 11.2.4.13.1.1 DISPC Priority Rule

The overlay manager is configured using the Z-order parameter. The Z-order value defined for each pipeline indicates the visibility order to the window on the screen. If the Z-order value of window A is lower than the Z-order to layer B, layer A is displayed below layer B. The transparency color keys and the alpha blending factors are then used to blend the layers together (see Section 11.2.4.13.1.2, DISPC ALPHA Blender, and Section 11.2.4.13.1.3, DISPC Transparency Color Keys). The Z-order is enabled by setting the DISPC\_GFX\_ATTRIBUTES[25] ZORDERENABLE bit or the DISPC\_VIDP\_ATTRIBUTES[25] ZORDERENABLE bit to 0x1 and by defining the Z-order in the DISPC\_GFX\_ATTRIBUTES[27:26] and DISPC\_VIDP\_ATTRIBUTES[27:26] ZORDER bit fields. Table 11-112 summarizes the register settings to enable and set the Z-order of a pipeline. Table 11-112 shows the default Z-order values when LCDALPHABLENDERENABLE and ZORDERENABLE are disabled.

Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 2943 (highlighted).

Pipeline	LCDALPHA BLENDERENABLE <sup>(1)</sup>	ZORDERENABLE	ZORDER	Resulting Z-Order Number
GFX	0	0	Don't care	0
	0	1	ZORDER	ZORDER
	1	Don't care	Don't care	3
VID1	0	0	Don't care	1
	0	1	ZORDER	ZORDER
	1	Don't care	Don't care	0

Ex. 65 - DRA75x, DRA74x Technical Reference Manual, Table 11-112 at 2943.

The Technical Reference Manual states that the Z-order is enabled by setting registers.

# 11.2.4.13.1.1 DISPC Priority Rule

The overlay manager is configured using the Z-order parameter. The Z-order value defined for each pipeline indicates the visibility order to the window on the screen. If the Z-order value of window A is lower than the Z-order to layer B, layer A is displayed below layer B. The transparency color keys and the alpha blending factors are then used to blend the layers together (see Section 11.2.4.13.1.2, DISPC ALPHA Blender, and Section 11.2.4.13.1.3, DISPC Transparency Color Keys). The Z-order is enabled by setting the DISPC\_GFX\_ATTRIBUTES[25] ZORDERENABLE bit or the DISPC\_VIDP\_ATTRIBUTES[25] ZORDERENABLE bit or the DISPC\_GFX\_ATTRIBUTES[27:26] and DISPC\_VIDP\_ATTRIBUTES[27:26] ZORDER bit fields. Table 11-112 summarizes the register settings to enable and set the Z-order of a pipeline. Table 11-112 shows the default Z-order values when LCDALPHABLENDERENABLE and ZORDERENABLE are disabled.

Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 2943 (highlighted).

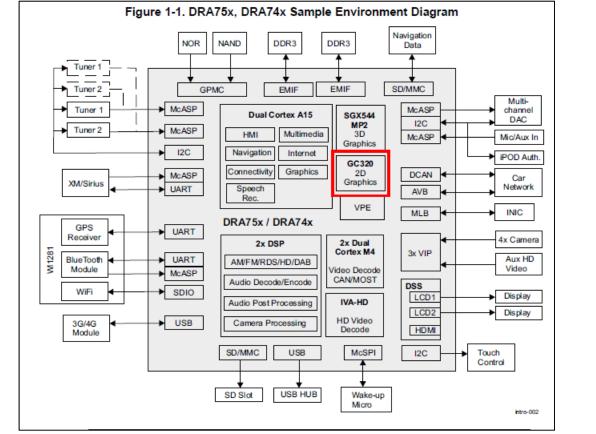
The DISPC\_GFX\_ATTRIBUTES register configures the graphics attributes. Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 3032. In order to be able to set the ZORDER, the window controller obtains data describing the windows in which the graphics images are displayed.

Address Offset 0	0x0000 00A0	
Physical Address 0	0x5800 10A0 Instance	DISPC
	LCD or VFP start period of the secondary LCD DISPC_CONTROL2.GOWB is set to 1 by soft	Shadow register, updated on VFP start period of primary or VFP start period of the third LCD or EVSYNC or whe ware and current WB frame is finished (no more data in event is defined based on the output using the pipeline: output or write-back to the memory
Type F	RW	
31 30 29 28 27 26 25 24 2	23 22 21 20 19 18 17 16 15 14 13	3 12 11 10 9 8 7 6 5 4 3 2 1 0
CHANNELOUT2 BURSTTYPE PREMULTIPLYALPHA ZORDER ZORDER ANTIFLICKER	RESERVED SUBSAMPLINGPATTERN SELFREFRESHAUTO FORCE1DTILEDMODE SELFREFRESH ARBITRATION	BUFPRELOAD RAMEPACKINGMODE NIBBLEMODE CHANNELOUT BURSTSIZE BURSTSIZE AND STANNELOUT BURSTSIZE BURSTSIZE AND STANNELOUT BURSTSIZE BURSTSIZE AND STANNELOUT BURSTSIZE BU

Bits	Field Name	Description	Туре	Reset
27:26	ZORDER	Z-Order defining the priority of the layer compared to others when overlaying. It is software responsibility to ensure that each layer connected to the same overlay manager has a different z-order value. If bit 25 is set to 0, the ZORDER bit field is ignored and replaced by the value 0.	RW	0x0
		0x0: Z-order 0: layer above solid background color and below layer with higher Z-order values.		
		0x1: Z-order 1: layer above layer with z-order value of 0 and below layers with z-order values of 2 and 3		
		0x3: Z-order 3: layer above all the other layers		
		0x2: Z-order 2: layer above layers with z-order value of 0 and 1 and below layer with z-order value of 3		
25	ZORDERENABLE	Z-order Enable. The bit field ZORDER is only used when the Z-order is enabled.	RW	0
		0x0: Z-order disabled. The Z-order of the layer is 0.		
		0x1: Z-order enabled. The Z-order is defined by the bit field ZORDER (bits 26 and 27).		

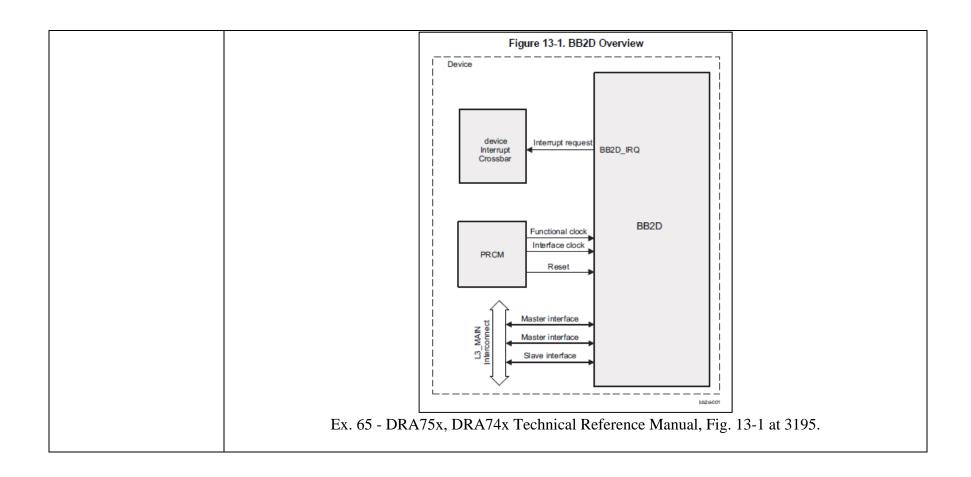
Ex. 65 - DRA75x, DRA74x Technical Reference Manual, Table 11-244 at 3031-32 (highlighted).

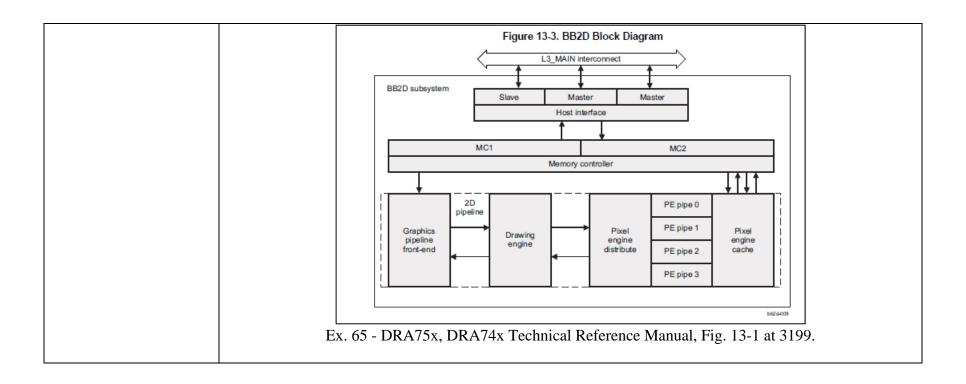
Additionally, the Technical Reference Manual for the DRA75x SoC for Automotive Infotainment Silicon Revision 2.0, 1.x discloses that the DRA750 includes a 2D graphics engine, highlighted in red below.



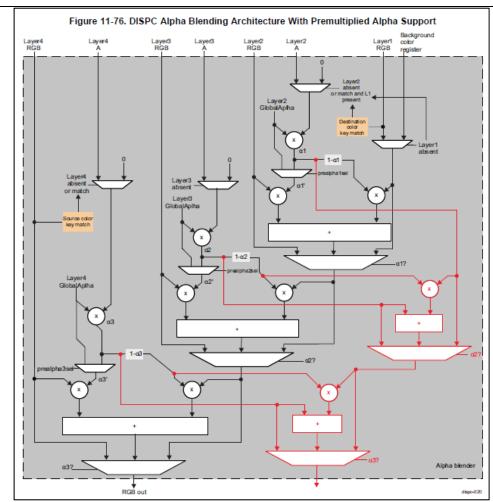
Ex. 65 - DRA75x, DRA74x Technical Reference Manual, Fig. 11-76 at 367 (annotated).

Upon information and belief, the 2D Graphics Engine would access data that describes windows in which the graphics images are displayed and this data would be sorted based on the respective depths of the windows.





												Tab	le 1	3-58	3. G	CMI	INO	RFE	AT	URI	ES1	1									
			7	Addre	ss Off	set				0x00	000	0074																			
				Physic	cal Ad	dress	5			0x59	900 (	0074					Inst	ance						В	B2D						
				Descri	iption					0:1	NON	vhich E LABL		ires a	are er	nable	ed in	the s	ubsy	ysten	n.										
			_	Гуре						R																					
		21	30	29 20	8 27	26	25 2	24	23 2	22 2	1 2	0 10	10	17	18	15	14	12	12		10	0		7	8	E	4	2	2	1	0
		31	$\overline{}$	$\overline{}$				_			Π.		Q.	17	0	10	14  -	<u>щ</u>	<u>nz</u>	ш	<u>0</u>	84	S	<u>и</u>	83	E C	32	3	2	z	Щ
		FC_FLUSH_STALL	BUG_FIXES6	WIDE_UNE	OK_TO_GATE_AXI_CLOCK	RESOLVE_OFF SET	NEGATIVE_LOG_FIX	CORRECT_OVERFLOW_VG	HALTIO	LINEAR_TEXTURE_SUPPORT	TEXTURE HORIZONTAL ALIGNMENT SELECT	NEW_FLOATING_POINT_ARITHMETIC	NEW_2D	BUG_FIXESS	DITHER_AND_FILTER_PLUS_ALPHA_2D	CORRECT_MIN_MAX_DEPTH	EXTENDED_PIXEL_FORMAT	TWO_STENCIL_REFERENCE	PIXEL_DITHER	HALF_FLOAT_PIPE	L2_WINDOWING	BUG_FIXES4	AUTO_RESTART_TS	CORRECT_AUTO_DISABLE	BUG_FIXES3	TEXTURE_STRIDE	BUG_FIXES2	BUG_FIXES1	VG_DOUBLE_BUFFER	V2_COMPRESSION	RSUV_SWIZZLE
	Ex. 6	55 -	DF	RA7	75x,	Dl	RA	74	x T	Гес	chn	nica	ıl F	Ref	ere	enc	e N	Ma	nu	al,	Fi	ig.	13	3-1	at	32	210	6 (	hig	gh]	lig
a display engine for blending the graphics images using alpha values associated with	The Accused Accused Texa engine for ble	as Iı	nstı	um	ent	Inf	ota	ain	me	ent	Sc	Cs	' s	yst	em	ı fo	or p	oro	ce	ssi	ng	g	rap	hi	cs	im	nag	ges	cc	om	ıpr
the graphics images; and	For example, Revision 2.0,																														



Ex. 65 - DRA75x, DRA74x Technical Reference Manual, Fig. 11-76 at 2946.

Additionally, the Technical Reference Manual explains that once the windows are configured based on their Z-order, alpha blending factors are used to blend the layers together.

#### 11.2.4.13.1.1 DISPC Priority Rule

The overlay manager is configured using the Z-order parameter. The Z-order value defined for each pipeline indicates the visibility order to the window on the screen. If the Z-order value of window A is lower than the Z-order to layer B, layer A is displayed below layer B. The transparency color keys and the alpha blending factors are then used to blend the layers together (see Section 11.2.4.13.1.2, DISPC ALPHA Blender, and Section 11.2.4.13.1.3, DISPC Transparency Color Keys). The Z-order is enabled by setting the DISPC\_GFX\_ATTRIBUTES[25] ZORDERENABLE bit or the DISPC\_VIDp\_ATTRIBUTES[25] ZORDERENABLE bit to 0x1 and by defining the Z-order in the DISPC\_GFX\_ATTRIBUTES[27:26] and DISPC\_VIDp\_ATTRIBUTES[27:26] ZORDER bit fields. Table 11-112 summarizes the register settings to enable and set the Z-order of a pipeline. Table 11-112 shows the default Z-order values when LCDALPHABLENDERENABLE and ZORDERENABLE are disabled.

Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 2943; see also 2946-47 (highlighted).

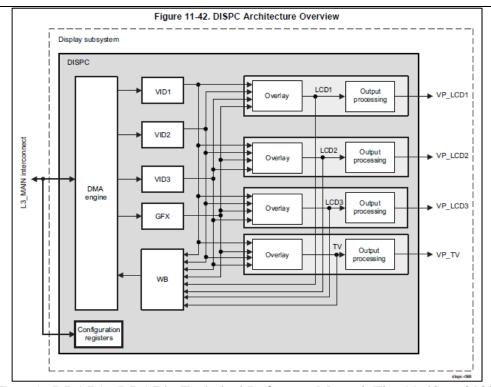
The Technical Reference Manual for the DRA75x SoC for Automotive Infotainment Silicon Revision 2.0, 1.x also explains that the 2D Graphics Engine blends the graphics images using alpha values.

## 13.1.1 BB2D Key Features Overview

- API support:
  - OpenWF™, DirectFB
  - GDI/DirectDraw™
- Flash
- BB2D architecture:
- BitBlt and StretchBlt
- DirectFB hardware acceleration
- ROP2, ROP3, ROP4 full alpha blending and transparency
- Clipping rectangle support
- Alpha blending includes Java® 2 Porter-Duff compositing rules
- 90-, 180-, 270-degree rotation on every primitive
- YUV-to-RGB color space conversion

Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 3195 (highlighted).

	Hardware acceleration for DirectFB:     High-speed video scaler     ROP2/3/4     Rectangle filling and drawing     Line drawing     Simple blitting     Stretch blitting     Blending with alpha channel (per-pixel alpha)     Blending with alpha factor (alpha modulation)     Nine source and destination blending functions     Porter-Duff rules support     Premultiplied alpha support     Colorized blitting (color modulation)     Source color keying     Destination color keying  Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 3196 (highlighted).
a memory for storing the graphics images,	The Accused Texas Instrument Infotainment SoCs' and head units and automobiles that incorporate the Accused Texas Instrument Infotainment SoCs' system for processing graphics images comprises a memory for storing the graphics images.  For example, the Technical Reference Manual for the DRA75x SoC for Automotive Infotainment Silicon Revision 2.0, 1.x explains that "[t]he DISPC can read and display the encoded pixel data stored in memory and write the output of one of the overlays or one of the pipelines into system memory." Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 2900. The DISPC architecture is shown below.



Ex. 65 - DRA75x, DRA74x Technical Reference Manual, Fig. 11-42, at 2900

In the DISPC, the DMA engine supplies the data from the memories to the graphics and video processing pipelines and stores encoded pixel data to the memories through the WB pipeline.

# 11.2.4.6 DISPC DMA Engine The DMA engine; Supplies data (encoded pixel data and gamma curve) from memories to the GFX, VID1, VID2, and VID3 pipelines through the interconnect based on the configuration of the DISPC and pipeline setting. Stores encoded pixel data from GFX/VID pipelines or overlays to memories through the WB pipeline and interconnect based on the configuration of the DISPC and WB pipeline setting.

Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 2905 (highlighted).

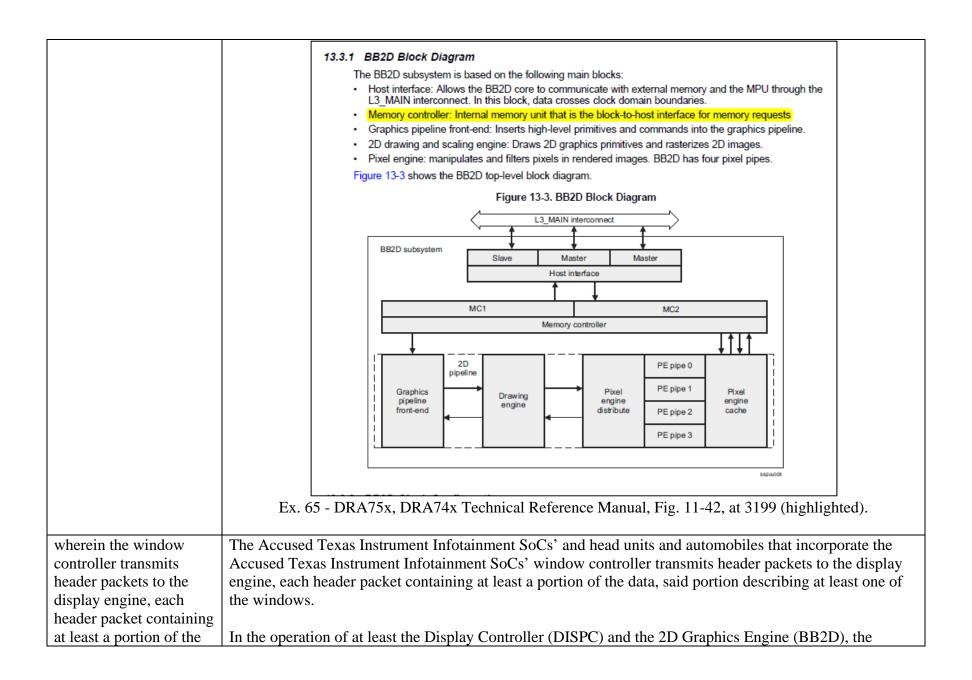
The Technical Reference Manual explains that the DRA75x SoC also includes on-chip memory.

## 1.3.13 On-Chip Memory

- The device can include up to three instantiations of an On-Chip Memory Controller (OCMC) with
  associated RAM with ECC, with total size up to 2.5 MiB. OCMC\_RAM2 (1MiB) and OCMC\_RAM3
  (1MiB) are not present on DRA74x devices, but are included in some of the DRA75x devices. For
  details, see the device data manual.
- Circular buffer feature for each OCMC RAM (8-MiB virtual address space required) allowing on-the-fly
  processing of VIP data by EVE
- · Save and Restore Memory / Scratch Pad in the wake-up domain

Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 373 (highlighted).

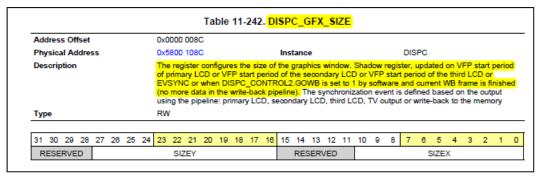
The Technical Reference Manual for the DRA75x SoC for Automotive Infotainment Silicon Revision 2.0, 1.x also explains that the 2D Graphics Engine includes a memory controller and can communicate with external memory and the MPU. Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 3199.



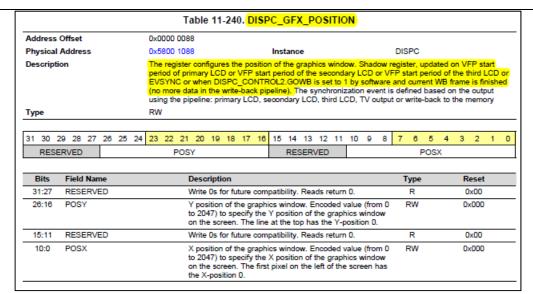
data, said portion describing at least one of the windows, and window controller transmits header packets containing data describing the windows. For example, in the DISPC, the height and width of each enabled layer as well as the position of the pixels is defined by the setting of certain bits in registers.

The height and width of each enabled layer (pipeline) must be defined in the SIZEY and SIZEX bit fields DISPC\_GFX\_SIZE[27:16][10:0]/ DISPC\_VIDP\_SIZE[27:16][10:0], and its x and y positions defined in the POSX and POSY bit fields DISPC\_GFX\_POSITION[26:16][10:0]/DISPC\_VIDP\_POSITION[26:16][10:0]. If there are no graphics or video-encoded pixels at a specific position, the programmable, solid background color appears. The solid background color is set in the DISPC\_DEFAULT\_COLORo[23:0] DEFAULTCOLOR bit field. Figure 11-75 is an example of priority rule.

Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 2945 (highlighted).



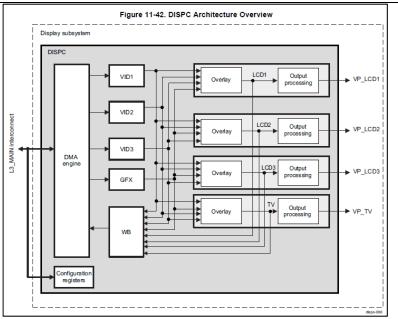
Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 3031 (highlighted).



Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 3031 (highlighted).

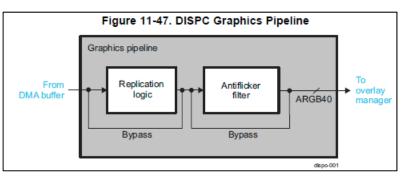
Additionally, in the 2D Graphics Engine, upon information and belief, the setting of certain bits in certain registers describes aspects of at least one of the windows, such as the alignment of the window.

										Tabl	e 13	-58.	GCI	MINC	ORFI	EAT	URI	ES1										1			_
			Addre	ss Offs	et			0x00	0000	0074																	_				
			Physi	cal Add	ress			0x59	000	0074				Ins	tance	e					BB2	D									
			Descr	ription				0 : N	ONE			es are	ena	bled ir	n the s	subs	ysten	n.													
			Type					R																			_				
		31 30	29 2	8 27	26 2	5 24	23	22 2	1 20	0 19	18	17 1	16 1	5 14	13	12	11	10	9	8 7	6	5	4	3	2	1	0				
		FC_FLUSH_STALL BUG_FKES6	WIDE_LINE	OK_TO_GATE_AXI_CLOCK	RESOLVE_OFFSET	CORRECT_OVERFLOW_VG	HALTIO	LINEAR_TEXTURE_SUPPORT NON POWER OF TWO	TEXTURE HORIZONTAL ALIGNMENT SELECT	NEW_FLOATING_POINT_ARITHMETIC	NEW_2D	BUG_FIXES	CORRECT MIN MAX DEPTH	EXTENDED_PIXEL_FORMAT	TWO_STENCIL_REFERENCE	PIXEL_DITHER	HALF_FLOAT_PIPE	L2_WINDOWING	BUG_FKES4	CORRECT ALTO DISABLE	BUG_FIXES3	TEXTURE_STRIDE	BUG_FIXES2	BUG_FIXES1	VG_DOUBLE_BUFFER	V2_COMPRESSION	RSUV_SWIZZLE				
	Ex. 65 - DRA7	75x,	DRA	<b>4</b> 74x	Т	echi	nica	al R	efe	erer	ice	Ma	anu	ıal a	at 3	321	6 (	hig	ghli	igh	ted	).						]			
wherein the graphics images are transferred from the memory to the display engine	The Accused Texas engine respons	s Ins	trun	nent i	Info	otai	nm	ent	So																						
responsive to said header packets.	For example, t Revision 2.0, 1 and write the o DRA75x, DRA that "[a]n over	l.x ex outpu A74x	xpla it of Tec	ins thousand	hat of t	"[t] the Ref	]he ove	DIS erlay nce	SPO VS ( M	C co or co anu	an i one ial	reac of at 2	d a the 290	nd (e pi)	dis <sub>]</sub> pel: Th	pla ine e T	y t es i Tec	he nto	en sy ica	coc ste	led m	pi me	xel mo	da ory	ita ."	sto Ex	ored k. 63	l in n 5 -	nem	ory	7



Ex. 65 - DRA75x, DRA74x Technical Reference Manual, Fig. 11-42 at 2900

The Technical Reference Manual further explains that, as shown below, the graphics entering the graphics pipeline come from the DMA buffer and then lead to the overlay manager.



Ex. 65 - DRA75x, DRA74x Technical Reference Manual, Fig. 11-47 at 2919

Additionally, the Technical Reference Manual explains that the DISPC overlay optimization fetches only the required pixels from the memory and that this selection is based on registers, which were set in accordance with the header packets.

#### 11.2.4.13.1.4 DISPC Overlay Optimization

The overlay optimization consists in fetching only the required pixels (that is, pixels that contribute to the final picture to be displayed [LCD1, LCD2, LCD3, or TV]). The decision to fetch the pixel from memory is based on the information available in the registers and on the following rules:

- The layer is enabled.
- The global alpha blending factor for the layer is different than 0x00.
- The current layer is behind an nonopaque layer (global alpha blending factor is different than 0xFF for the layer in the preceding).

The result of the overlay optimization is a reduction of the bandwidth by fetching only the mandatory pixels. The overlay mechanism is independent for each overlay: LCD1, LCD2, LCD3, and TV. Because each layer (GFX, VID1, VID2, and VID3) can be associated to only one overlay at a time, it is possible to optimize the fetch of the pixels for each layer based on the overlay information. The overlay optimization must be run on the DMA engine time window and not on the display time window. The pixels are fetched by the DMA engine before the display processing.

Ex. 65 - DRA75x, DRA74x Technical Reference Manual at 2950 (highlighted).

With respect to the 2D Graphics Engine, the Technical Reference Manual explains that the BB2D includes a memory controller that is the "block-to-host interface for memory requests." Ex. 65 (Tech Ref Manual) at 3199. As can be seen in the Figure below, both the Graphics Pipeline front-end and pixel engine cache communicate with the memory controller.

